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11 GEORGIA-PACIFIC LLC

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA

15 EQUAL EMPLOYMENT
16 OPPORTUNITY COMMISSION,

17 Plaintiff,

18 v.

19 GEORGIA-PACIFIC LLC,

20 Defendant.

Case No. C 07 3944 SBA

**DECLARATION OF CURTIS KIMBRO IN
SUPPORT OF DEFENDANT'S
OPPOSITION TO CHARGING PARTY
JANET STEGE'S MOTION TO
INTERVENE**

Date: March 4, 2008
Time: 1:00 p.m.
Courtroom: 3
Judge: The Hon. Sandra B. Armstrong

21 I, Curtis Kimbro, hereby declare:

22 1. I am the Human Resources Generalist for Georgia-Pacific Corrugated, LLC
23 ("Corrugated") at its San Leandro plant. In that capacity, I am the custodian of records relating to
24 Corrugated's employees at its San Leandro plant (many of which relate to the time, prior to April
25 2004, during which the same employees worked at Georgia-Pacific's South San Francisco plant). I
26 am not an employee of Georgia-Pacific Holdings, LLC.

27 2. According to available records, Janet Stege worked, at the South San
28 Francisco plant, as a Stacker Operator, a Taper Operator, a General Floor Worker, an Equalok
Assistant Operator, and a Press-Flexo Assistant Operator, often also serving as a "Rover" because of
her knowledge of a variety of positions. From approximately April 2001 until the closure of the
South San Francisco plant in April 2004, Stege worked as a janitor. At Stege's request, she was
accommodated with a 40-hour per week work restriction during the last several years of her

1 employment at the South San Francisco plant. The janitor position Stege held from 2001 to 2004
2 was part of the accommodation GP provided to Stege: unlike production line positions, the janitor
3 position did not require mandatory overtime, pursuant to the collective bargaining agreement
4 between GP and the Graphic Communications Union ("CBA").

5 3. According to available time records, starting in April 2004 and continuing to
6 the present, Stege has been required, on occasion, to work overtime pursuant to the CBA. Stege has
7 continued to be given a swing shift, per her request.

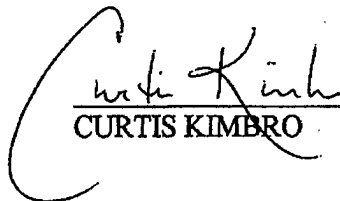
8 4. Available records indicate that Joe McGovern and Ron Huff, the former Plant
9 Manager and General Manager in April 2004, respectively, left Corrugated more than two years ago.
10 The same is true for Ron Orr, former union steward, and Cheryle Webb-Nelson, former HR
11 Manager. Aaron Ybarrondo, who was the HR Manager in April 2004, moved to a Corrugated plant
12 in Savannah, Georgia, more than two years ago. Further, one of Stege's former supervisors, former
13 Shift Superintendent Mike Belmessieri, has been on extended medical leave and has not worked
14 regularly at Corrugated since serving as a juror in the Scott Peterson trial in summer 2004.

15 5. The current plant superintendent for Corrugated's San Leandro plant is Alex
16 Reyes. I am the current HR Generalist. Bill Yeager is an Area HR Manager, who services several
17 plants. None of us were directly involved in the events of April 2004, when Stege says that she was
18 told that, in order to work at the San Leandro plant, she would be required, on occasion, like all other
19 employees, to work overtime pursuant to the CBA.

20 6. Pursuant to the Accident & Sickness policy under the CBA, Stege has
21 received up to \$600.00 per week while on medical leave (including any State Disability payments
22 she may have received). Since December 1, 2004, available time records indicate that Stege has
23 taken more than seven months of leave. Since June 9, 2005, Stege has taken more than four months
24 of leave.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 11th day of February, 2008 at San Leandro, California.

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CURTIS KIMBRO

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